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November 23, 2020

Honorable Colleen McMahon
Chief United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

BY ECF

Re: United States v. James Cahill
20 Cr. 521 (CM)

Dear Judge McMahon:

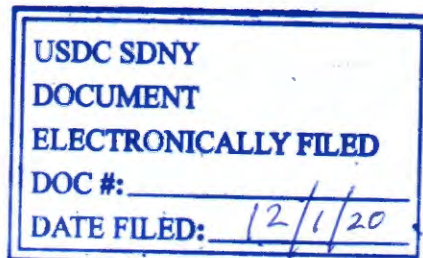
As the Court is aware, defendant James Cahill ("Cahill") is currently at liberty on a fully secured \$500,000 Appearance Bond that contains several conditions including home detention with permission to leave his home for specific approved purposes and a restriction of travel to the Southern and Eastern Districts of New York. By this letter, Cahill respectfully requests permission to travel to the home he owns in Long Beach, New York on December 2, 2020, so that he can winterize the home and close it for the season. If this application is granted, he would leave his home in Rockland County, New York at 8:00 am and leave Long Beach by no later than 6:00 pm. He will remain in contact with Pretrial Services throughout the day. The government, by Assistant United States Attorney Jason Swergold, and Pretrial Services, by United States Pretrial Services Officer Winter Pascual, consent to this application.

Thank you for Your Honor's consideration of these requests.

Very truly yours,

Sanford Talkin
Sanford Talkin

cc: AUSA Jason Swergold (by ECF)
USPTO Winter Pascual (by email)



12/1/20
Permission to travel as
requested herein is
granted
Colleen McMahon